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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

CASE NO. 3:17-cv-00939-WHA

13 Plaintiff,

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
PLAINTIFF WAYMO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS
NOTICE OF SUBMISSION OF
INTERROGATORY RESPONSES**

14 vs.

15 UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
16 LLC,

17 Defendants.

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1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under
 7 Seal Portions of Its Notice of Submission of Interrogatory Responses, filed concurrently herewith (the
 8 “Administrative Motion”). The Administrative Motion seeks an order sealing the following materials
 9 filed concurrently herewith:

Document	Portions to Be Filed Under Seal	Designating Party
Appendix A	Entire Document	Waymo; Defendants

12 3. Specifically, the documents identified in the table above as designated by Waymo
 13 contain or refer to trade secret information, which Waymo seeks to seal.

14 4. The documents identified in the table above contain, reference, and/or describe
 15 Waymo’s trade secrets. The information Waymo seeks to seal includes the confidential design and
 16 functionality of Waymo’s proprietary autonomous vehicle system, including its technical
 17 specifications and/or LiDAR designs, which Waymo maintains as secret. I understand that these trade
 18 secrets are maintained as secret by Waymo (Dkt. 25-47) and that the trade secrets are valuable to
 19 Waymo’s business (Dkt. 25-31). The public disclosure of this information would give Waymo’s
 20 competitors access to descriptions of the functionality or features of Waymo’s autonomous vehicle
 21 system. If such information were made public, I understand that Waymo’s competitive standing
 22 would be significantly harmed.

23 5. Waymo’s request to seal is narrowly tailored to those portions of Appendix A that
 24 merit sealing.

25 6. Waymo only seeks to seal the documents identified in the table above as designated by
 26 Defendants because Waymo believes such information is considered confidential or non-public by
 27 Defendants.

1 I declare under penalty of perjury under the laws of the State of California and the United
2 States of America that the foregoing is true and correct, and that this declaration was executed in San
3 Francisco, California, on February 7, 2018.

4 By /s/ Felipe Corredor
5 Felipe Corredor
6 Attorneys for WAYMO LLC

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8 **SIGNATURE ATTESTATION**

9 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
10 filing of this document has been obtained from Felipe Corredor.

11 /s/ Charles K. Verhoeven
12 Charles K. Verhoeven